



ASSOCIATION FOR **MAXIMUM SERVICE TELEVISION, INC.**

July 3, 2008

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
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Washington, DC 20554

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RE: Ex Parte Presentation
ET Docket Nos. 04-186 and 02-380

Dear Ms. Dortch:

On Thursday, July 3, David Donovan (President, MSTV), Victor Tawil (Senior Vice President, MSTV), Bruce Franca (Vice President, Policy and Technology, MSTV), Ann Bobeck (Associate General Counsel, NAB), Martin Franks (Exec. VP Planning Policy & Government Relations, CBS Corporation), and Jonathan Blake (Covington & Burling), met with Commissioner Michael Copps and his legal advisors, Rich Chessen and Bruce Gottlieb, to discuss the above designated white spaces proceeding.

They made the point that MSTV's, NAB's and broadcasters' overarching concern is protecting the American public from destructive interference to its highly valued and widely relied upon local and universal television service, including newsgathering services from licensed wireless microphones. Mr. Franca reported on the recent series of OET Laboratory tests of unlicensed devices. They have demonstrated that no unlicensed devices can rely on sensing technologies to avoid interference to the public's television service or to wireless microphone operations.

We noted that, under appropriate circumstances and conditions, geolocation technologies may offer the potential for viable interference protection. But even with geolocation technologies, the FCC must also focus on protections against adjacent channel interference, requirements to assure an adequate database to support geolocation methodologies, robust certifications procedures, and powerful and effective policing mechanisms. Adjacent channel issues also are vital to protecting TV viewers and licensed wireless microphone services used by broadcasters.

The attached was distributed at the meeting.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "D. Donovan", written over a horizontal line.

David Donovan
President

CC: Commissioner Michael Copps
Mr. Rick Chessen
Mr. Bruce Gottlieb
Ms. Ann Bobeck

Crossing wireless politically?

Unlike the rest of the country, for me, there is little difference between the Republican National Convention and the Democratic National Convention.

Red... blue... as owner of the company providing audio support for both conventions it's all the same to me.

By Scott Harmala

Both conventions depend on the same state-of-the-art audio visual equipment, like wireless microphones, and rely on nearly the same group of people to make sure all this equipment delivers the broadcast-quality sound viewers expect.

Though it might not be readily apparent to those watching the political conventions from home — or even to many of the delegates at the conventions themselves — the conventions rival the Olym-

pics in their technological complexity. In fact, Louis Libin, who ran the 2004 Democratic National Convention's wireless coordination committee, told the New York Times "this is probably the busiest, noisiest radio frequency environment on the planet right now."

Every participating organization requires communications — from the broadcasters to government agencies to the candidates. According to the 2008 Political Conventions Communications Committee, the greatest challenge will be the sheer volume of wireless microphones in and out of the venues.

Quite obviously, wireless microphones are integral to events like these. They allow everyone, from American news networks to visiting journalists from around the world, to report on the proceedings while freely moving about the convention floor.

But if technology companies such as Google, Motorola and others get their way, this freedom of movement and in-depth coverage will go by the wayside. These companies have asked the Federal Communications Commission for authority to sell wireless devices that would operate in the same band of spectrum — known as "white spaces" — as wireless microphones.

My peers and I can't begin to fathom the chaos something like this would cause during an event like a political convention. Interference with wireless microphones would be rampant, and the clean, reliable audio we have come to expect would be severely compromised.

Political conventions as we experience them today will be gone forever. Instead, we will be thrown back in time, to the days when the broadcast media were limited in where they could go simply by technology.

Google and Motorola have maintained their white spaces devices won't cause the kind of interference that keeps me up at night — because these devices will have embedded technology enabling them to sense when a certain frequency is already being used.

The FCC is testing prototype devices to see whether the technology actually works, and what they're finding is this: the technology still has a lot of bugs that need to be worked out before it's "ready for prime time." This has led to further promises of interference protection from technologies that have not even been invented yet. As part of the team responsible for ensuring that the Republican and Democratic National Conventions are heard clearly all over the world, these developments do not give me confidence.

Wireless microphones are crucial to nearly every live event today, and if the FCC fails to ensure that wireless microphones are protected from harmful interference, political conventions and

many other live events will suffer irreparable damage. It is pivotal that the FCC not allow new products to use the white space spectrum before the technology is ready.

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Scott Harmala is chief technology officer and vice president for engineering at ATK Audiotek, the company that will supply audio support to the Democratic and Republican National Conventions. The company has provided such services in the past to a number of entertainment awards ceremonies and to the 1996 and 2002 Olympics in Atlanta and Salt Lake City.

